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VIA ECF

Honorable Judge LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

- and -

Honorable Magistrate Judge Marcia M. Henry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *The Federal Savings Bank v. Paul J. Manafort, Kathleen B. Manafort, et al.*
Case No.: 21-cv-1400

Dear Judge Hall and Magistrate Judge Henry:

We represent Plaintiff The Federal Savings Bank ("TFSB"). This letter is written to both of your Honors in response to the latest request by defendants to delay this matter by extending their time to respond to TFSB's document demand by three weeks. Defendants have not complied with a single deadline to do anything in this case without waiting until the last minute and then requesting an extension. Defendants, for example, requested and received two extensions of time to answer the complaint herein and then filed an abjectly frivolous motion to dismiss when the third deadline to respond to the complaint was set to expire. Defendants' strategy of trying to delay having this matter, **concerning two commercial promissory notes that matured in January 2018 without being paid**, as long as possible must no longer be tolerated.

As per the last conference with Judge Hall, discovery in this matter was to be both expedited and limited given the fact that the loans at issue matured over three and one half years ago and Plaintiff can establish a prima facie entitlement to summary judgment right now. Defendants' latest request to delay this matter must be rejected.

Respectfully submitted,

Thomas J. McGowan

cc: Rodney Perry, Esq.